

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
(Northern Division)**

ASHLEY BOSHEA as representative of the  
ESTATE OF DAVID J. BOSHEA,

Plaintiff,

v.

COMPASS MARKETING, INC.,

Defendant.

Case No.: 1:21-CV-00309-ELH

**MOTION FOR EXTENSION OF TIME  
TO FILE ATTORNEYS' FEE PETITION**

Plaintiff, Ashley Boshea, as the representative of the Estate of David Boshea, respectfully moves for an order extending the time for Plaintiff to submit a Petition for Attorneys' Fees and Costs to and including the seventh calendar day after Defendant's *Motion for Relief from a Judgment or, in the Alternative, for New Trial* is disposed of.

The deadline for submitting the petition is currently Friday, September 19, 2025.

This extension will not prejudice either party. If Defendant's Motion is denied additional fees for opposing the motion will be subject to Plaintiff's petition. If it is granted Plaintiff's claim for reimbursement for fees and costs will be moot.

Defendant Compass Marketing's counsel, one of whom is in trial and the other out of town, have been asked to consent. They are waiting for their client's instructions.

WHEREFORE, Plaintiff respectfully requests that the Court grant this Motion and extend the deadline to file his petition as set forth above.

Respectfully submitted,

Thomas J. Gagliardo  
Of Counsel

Gilbert Employment Law, P.C.  
8403 Colesville Road, Suite 1000  
Silver Spring, Maryland 20910  
[tgagliardo@gelawyer.com](mailto:tgagliardo@gelawyer.com)

/s/ Gregory J. Jordan  
Gregory J. Jordan (Admitted Pro Hac Vice)  
Jordan & Zito LLC  
350 N. LaSalle Street, Suite 1100  
Chicago IL 60654  
(312) 854-7181  
[gjordan@jz-llc.com](mailto:gjordan@jz-llc.com)  
Counsel for plaintiff

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the **Motion for Extension of Time to File Attorneys' Fee Petition** was served via this Court's ECF system and by electronic mail on September 12, 2025 addressed to the following:

**Defendant's Counsel:**

Stephen B. Stern  
[stern@kaganstern.com](mailto:stern@kaganstern.com)

Shannon M. Hayden  
[hayden@kaganstern.com](mailto:hayden@kaganstern.com)

/s/Noah Wolf  
Noah Wolf  
Paralegal  
Gilbert Employment Law, P.C.  
8403 Colesville Road, Suite 1000  
Silver Spring, Maryland 20910  
[nwolf@gelawyer.com](mailto:nwolf@gelawyer.com)

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**ORDER**

This matter having come before the Court on Plaintiff's Motion for an Extension of Time to File a Petition for Attorneys' Fees and Costs, the premise, and opposition if any, having been considered said motion shall and hereby is GRANTED on this \_\_\_\_ day of September 2025. The Petition shall be due by the close of business seven (7) calendar days after Defendant's *Motion for Relief from a Judgment or, in the Alternative, for New Trial* is disposed of.

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Ellen L. Hollander  
United States District Judge